

**MICHAEL HARRIS  
 8 FOREST ROCK COURT  
 CATONSVILLE, MD 21228**

**Plaintiff**

**V**

**MAYOR & CITY COUNCIL OF  
 BALTIMORE CITY  
 100 HOLLIDAY STREET, SUITE 101  
 BALTIMORE, MD 21202**

**SERVE ON: EBONY THOMPSON  
 100 HOLLIDAY STREET, SUITE 101  
 BALTIMORE, MD 21202**

**AND**

**BALTIMORE CITY POLICE  
 DEPARTMENT  
 601 E. FAYETTE STREET  
 BALTIMORE, MD 21202**

**SERVE ON: COMMISSIONER  
 RICHARD WORLEY  
 601 E. FAYETTE STREET\*  
 BALTIMORE, MD 21202**

**JOHN DOE  
 UNKNOWN  
 UNKNOWN**

**Defendants**

\* \* \* \* \*

### **COMPLAINT**

Plaintiff Michael Harris (hereinafter referred to as “Plaintiff”), by and through his attorneys, Brandon C. James, Esq. and the Law Office of Barry R. Glazer, P.C., hereby files suit against Defendant Mayor & City Council of Baltimore City, Defendant Baltimore City Police Department, and John Doe (hereinafter referred to as “Defendants”) and, in support thereof, states as follows:

1. Plaintiff is now, and at all times relevant to this suit, was a resident of Baltimore City, Maryland.

2. Defendant Mayor & City Council of Baltimore City, is now and at all times relevant to this suit, the City of Baltimore.

3. Defendant Baltimore City Police Department is an agency for the Mayor & City Council of Baltimore City.

4. John Doe is a Baltimore City Police Officer.

5. On December 30, 2023, Plaintiff was criminally summoned to appear in the District Court for Baltimore City for an allegation of reckless endangerment and second-degree assault in case number 5B0248558. The incident allegedly occurred on December 27, 2023. Plaintiff was ordered to appear in the District Court for Baltimore City on February 16, 2024, at 1:30 pm.

6. On February 8, 2024, Plaintiff was unlawfully arrested on the basis of a warrant from case number 4B02482064 which charged Plaintiff from the incident which allegedly occurred on December 27, 2023. December an allegation of second-degree assault which occurred on December 27, 2023. It appears case number 4B02482064 is a duplicate filing of the incident in case number 5B0248558. Plaintiff was detained without bond until February 14, 2024. At some point, someone deleted both case numbers out of the government system.

7. Pursuant to all state laws, Plaintiff has provided notice to Defendants of this incident.

**COUNT I – PLAINTIFF V DEFENDANTS**  
**(FALSE ARREST)**

8. The allegations of fact hereinabove and below are set forth, adopted herein, and made a part hereof, and further,

9. John Doe had no rational reason to believe that Plaintiff had an active warrant for the December 27, 2023 incident.

10. Plaintiff's arrest was made with a non-valid warrant and without any probable cause.

11. As a result of Plaintiff being incarcerated, Plaintiff has suffered mental and physical injuries.

**COUNT II – PLAINTIFF V DEFENDANTS**  
**(FALSE IMPRISONMENT)**

12. The allegations of fact hereinabove and below are set forth, adopted herein, and made a part hereof, and further,

13. John Doe illegally arrested Plaintiff which caused him to be unlawfully deprived of his liberty to move.

14. Plaintiff was incarcerated for eight days.

15. As a result of Plaintiff being incarcerated, Plaintiff has suffered mental and physical injuries.

**COUNT III – PLAINTIFF V DEFENDANTS**  
**(MALICIOUS PROSECUTION)**

16. The allegations of fact hereinabove and below are set forth, adopted herein, and made a part hereof, and further,

17. Defendants instituted a criminal proceeding against Plaintiff. The termination of the proceeding was in the favor of Plaintiff. There was an absence of probable cause for the proceeding, and the prosecution was instituted with malice or a purpose other than bringing the Plaintiff to justice.

Defendant's conduct constituted an intentional touching (or the setting in motion of an event, which resulted in offensive, non-consensual touching) of Plaintiff by Defendant and was undertaken deliberately and with actual or implied malice.

18. As a result of Defendant conduct, Plaintiff suffered substantial damages, including but not limited to, extreme permanent pain and suffering, humiliation, and mental distress.

**COUNT IV – PLAINTIFF V DEFENDANTS**  
**(Violation of § 1983)**

19. The allegations of fact hereinabove and below are set forth, adopted herein, and made a part hereof, and further,

20. Defendants have violated § 1983 of Title 42 of the United States Code by denying Plaintiff the rights, privileges, and immunities guaranteed to her and other citizens by the Constitution of the United States.

21. In arresting Plaintiff, Defendants used physical force which was clearly excessive in light of the circumstances existing at the time of the arrest.

22. Defendant Mayor & City Council of Baltimore City owed a duty of care to Plaintiff and to other citizens of Baltimore City, Maryland to protect their Constitutional rights under the Fourth and Fourteenth Amendments of the United States Constitution.

23. As evident by the events alleged herein, the Defendant Mayor & City Council of Baltimore City failed to protect these rights by failing to properly train and supervise its officers.

24. As a direct and proximate result of Defendants violations of Plaintiff's Constitutional rights and the Defendant's failure to protect its citizen's Constitutional rights, Plaintiff has sustained injuries and has incurred other expenses.

WHEREFORE, Plaintiff demands judgment against Defendants for compensatory damages an amount in excess of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00), and for punitive damages in excess of ONE MILLION DOLLARS (\$1,000,000.00), with the exact amount to be determined at trial, together with interest, costs and attorneys' fees, and such other and further relief as this Court deems proper.

Respectfully submitted,

/s/

Brandon C. James  
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P.O. Box 27166  
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Baltimore, MD 21230

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*Attorney for Plaintiff*

**DEMAND FOR JURY TRIAL**

Plaintiff does hereby demand a trial by jury on all counts.

Respectfully submitted,

/s/

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**CERTIFIED MAIL**



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Ebony Thompson  
Mayor & City Council of Baltimore City  
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